



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MKP  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 19, 2019

**By Hand and ECF**

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (NGG) (S-2)

Dear Judge Garaufis:

The government respectfully writes in response to the defendants' letter submitting follow-up questions for voir dire, Dkt. No. 555. The government submits that some of the questions suggested by the defendants do not further the objective of determining whether a prospective juror can be fair and impartial. The government also notes that while it has not presently raised any cause challenges to the prospective jurors, the government respectfully reserves its right to challenge any of these jurors for cause at the appropriate time during oral voir dire.

The government respectfully requests that the Court inquire further regarding the following questions in addition to those identified in the defendants' letter:

#	Additional Question(s)
<b>11</b>	55, 56, 71(b), 75, 76, 91
<b>13</b>	71(b), Exhibit A
<b>16</b>	71(b)
<b>17</b>	33(b), 76
<b>19</b>	63, 84

<b>20</b>	60
<b>22</b>	41
<b>24</b>	68
<b>29</b>	63
<b>31</b>	34, 90
<b>32</b>	36
<b>33</b>	52, 55
<b>36</b>	52
<b>38</b>	21, 87
<b>40</b>	81
<b>57</b>	15-16
<b>62</b>	62(b)
<b>63</b>	40, 45
<b>73</b>	59

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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cc: Clerk of Court (NGG) (by ECF)  
Counsel of Record (by ECF)